



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Brad Powell, Acting Regional Forester
USDA Forest Service
Pacific Southwest Region (R5)
1323 Club Drive
Vallejo, CA 94592

Dear Mr. Powell:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the **Sequoia National Forest Trail Plan**. EPA's review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA assigned a rating of EC-2 to the Draft EIS prepared for this project, and our review of the FEIS indicates that the Forest Service has responded adequately to the concerns expressed in our January 25, 1996 comment letter.

To the degree that the decision is limited to amending the Forest Plan for the Sequoia National Forest, we have no objections to the decision, and see no reason to re-open the NEPA analysis and decision making processes. However, we are concerned that certain elements of the final plan, if implemented, may run contrary to the moratorium on construction in roadless areas announced on February 11, 1999, and Administration policy as expressed in the Clean Water Action Plan. Accordingly, we request that you take the following actions:

- 1) suspend evaluation and construction of new motorized trails in roadless areas pending the release of the Forest Service's new transportation policy, currently scheduled for Summer 2000;
- 2) suspend evaluation and construction of new motorized trails near streams and meadows pending the completion of the NEPA process for the Sierra Nevada Forest Plan Amendment, which will include new standards and guidelines for aquatic, riparian, and meadow ecosystems;
- 3) ensure that construction of new motorized trails in currently roaded areas is consistent with the policy goals expressed in the Clean Water Action Plan, which emphasizes maintenance, relocation, and obliteration of forest roads and trails causing adverse impacts to water quality (see attachment);

4) include EPA on the mailing list for any additional NEPA documents prepared to analyze new motorized trail construction pursuant to the plan;

5) to the degree possible, evaluate proposals for new construction at a watershed scale, consistent with CEQ guidance.

We appreciate the opportunity to review this FEIS and your consideration of our request. If you or your staff would like to arrange a meeting to discuss the issues raised in this letter, please contact Leonidas Payne of the Federal Activities Office at (415) 744-1571.

Sincerely,

A handwritten signature in black ink, appearing to read "David Farrel" followed by a stylized flourish.

David Farrel, Chief
Federal Activities Office

Attachment: Clean Water Action Plan, Pages 33-34

(5) Development of a process and guidelines for identifying and designating waters or watersheds on federal lands that may have significant human health, public use, or aquatic ecosystem values and a need for special protection.

(6) A greater role for citizen stakeholders in completing watershed assessments, monitoring pollution sources, and planning and implementing restoration efforts through collaborative stewardship approaches.

KEY ACTION: By 1999, DOI and USDA, in consultation with other federal agencies, states and tribes, and other stakeholders, will develop a Unified Federal Policy to enhance watershed management for the protection of water quality and the health of aquatic ecosystems on federal lands.

Increase Forest Road Maintenance and Obliteration

Roads and trails are primary sources of sediment runoff on federal lands. Each federal land management agency has standards for road maintenance that include practices for protecting water resources. However, a significant backlog of maintenance needs exists. For example, due to funding constraints, the U.S. Forest Service currently maintains only 40 percent of its road system to standard. Using funds from forest receipts as allowed under PL-62-430, the U.S. Forest Service can increase such maintenance of roads and trails 20 percent or more. The U.S. Forest Service and the Bureau of Land Management (BLM) will increase maintenance of roads and trails and aggressively relocate problem roads and trails to better locations. Where unneeded roads pose threats to water quality, they will be obliterated and the land restored. Efforts will be aimed at improving watercourses affected by erosion and sediment from roads/trails and at improving

Water Quality Improving on Public Lands in Oregon, Washington, and California

The President's Northwest Forest Plan, initiated in April 1994 and signed by the Secretaries of the Departments of Agriculture and the Interior, set in motion unprecedented collaborative action for managing 25 million acres and improving water quality on public lands in Oregon, Washington, and Northern California. A key element of the Northwest Forest Plan is the Aquatic Conservation Strategy, a framework for managing federal lands, with an emphasis on restoring habitats for stocks at risk — including various salmon and trout — and improving water quality. The strategy has four main elements to achieve its objectives: (1) riparian reserves, (2) delineation of critical watersheds, (3) analysis of watershed conditions and hydrologic functions, and (4) watershed restoration. To date, an interagency effort has completed watershed analysis on approximately 70 percent of the land base within the Northwest Forest Plan area. Since FY 1994, approximately \$22-\$26 million dollars a year have been allocated to the Bureau of Land Management and the U.S. Forest Service to continue the program of ecosystem restoration, community assistance, and job creation for displaced timber workers.

watersheds with priority water quality or habitat improvement needs.

KEY ACTION: Substantially increase maintenance of forest roads and trails on federal lands to protect water quality beginning in 1998; relocate and improve water quality protection for over 2,000 miles of roads and trails per year through 2005; and decommission or obliterate 5,000 miles per year by 2002.

KEY ACTION: The U.S. Forest Service will publish new forest transportation regulations by 1999. Stakeholder involvement will be solicited in the development of these regulations, which will consider public needs, funding, and scientific and environmental information in determining the size, purpose, and extent of the forest transportation system. In 1998, a temporary moratorium on new road construction in roadless areas of greater than 5,000 acres will be in effect for 18 months or until the U.S. Forest Service publishes new forest transportation regulations.

KEY ACTION: In consultation with other federal agencies and states, in 1999, EPA will consider whether to revise Clean Water Act permit regulations relative to forest roads and develop a pilot permit program for forest roads on federal lands.

Enhance the Condition of Riparian Areas and Stream Corridors

Riparian areas comprise a small percentage of the landscape, yet are critical to water quality protection and to the maintenance and health of streams and aquatic

habitat. The condition of many riparian areas suffers from past effects and many continue to receive tremendous pressure for use. Streams and riparian zones reflect the overall health of the watershed and are often the focal point for conflicting resource demands. Protecting and restoring these vital resources represents a challenge for public land managers. Estimates show that, at the current rate of restoration, it will take more than 50 years to restore critical areas. Through completion of actions in assessment, education, technology transfer and monitoring, restoration projects, and collaboration with states, tribes, and local communities, federal agencies will enhance the quality of streams and riparian zones and accelerate restoration.

KEY ACTION: The BLM, the U.S. Forest Service, and other federal land management agencies will implement an accelerated program to improve or restore 25,000 miles of stream corridor by 2005.

Sustain Forest Health to Protect Watersheds and Water Quality

The health of many streams and watersheds is tied directly to forests. Forests increase the resiliency of watersheds through water storage, soil protection, and filtering processes. Forests are also an integral part of future strategies for reducing global warming, controlling storm water, and improving quality of life. In the East, stream water quality is directly related to the amount and condition of forests in a watershed, and riparian forests and wetlands are critical as buffers for upslope activities. In the West, many watersheds are severely affected each year by wildfires, intensified by declines in forest health. Catastrophic fires can destroy watershed functions and stream conditions for decades.

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EPA REGION IX SUMMARY PARAGRAPH

ERP NUMBER: F-AFS-K65176-CA

CEQ NUMBER: 980523

DATE OF EPA COMMENT LETTER: 02/19/99

DATE SENT TO EPA HQ: 02/19/99

NAME OF PRINCIPAL REVIEWER: PAYNE

NAME OF PROJECT EIS:

Sequoia National Forest Trail Plan

SUMMARY PARAGRAPH:

expressed environmental concerns with several elements of
EPA noted ~~potential conflicts between~~ the final plan, the moratorium on construction in road-less areas, and the Clean Water Action Plan, and requested that the Forest Service suspend evaluation and construction of new motorized trails pursuant to the Forest Plan amendment pending the release of the Forest Service's long-term transportation policy and the completion of the Sierra Nevada Forest Plan Amendment NEPA process.

APPROVED FOR FEDERAL REGISTER PUBLICATION BY: _____